

RUSTIN S. POLK
Texas Bar No. 00784773
POLK & ASSOCIATES
214bankruptcy.com
4514 Cole Ave., Suite 600
Dallas, Texas 75205
Telephone (214) 740-1160
Telecopier (214) 572-7273

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	§	CASE NO. 09-38264
	§	
LIF ESMAEL MODABBERI	§	CHAPTER 13
	§	

DEBTORS' RESPONSE TO
TRUSTEE'S NOTICE OF INTENT
TO CERTIFY CHAPTER 13 CASE FOR DISMISSAL

COMES NOW the Debtor above-named, through counsel, in response to the Trustee's Notice of Intent to Certify Chapter 13 case for Dismissal filed herein and respectfully show the Court:

1. The Debtor originally filed this case pro se.
2. The Debtor, on 2/25/2010, retained the law firm Polk & Associates to represent him in the above-captioned case and are getting all the information together for the Trustee.
3. The 341 Meeting of Creditors has been reset to 3/18/2010.

THEREFORE, the Debtor request that the Trustee's Notice of Intent to Certify Chapter 13 case for Dismissal be denied.

Respectfully submitted,

/s/ Rustin Polk
RUSTIN S. POLK
Texas Bar No. 00784773
POLK & ASSOCIATES
214bankruptcy.com
4514 Cole Ave., Suite 600
Dallas, Texas 75205
Telephone (214) 740-1160

Telecopier (214) 572-7273
ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served on all parties as indicated on March 9, 2010.

/s/ Rustin Polk

Debtors:

Lif Esmael Madabberi
3883 Turtle Creek Blvd., #2010
Dallas, TX 75219
via ecf and USPS

Bankruptcy Trustee:

Tom Powers
Standing Chapter 13 Trustee
125 E. John Carpenter, Ste 1100
Irving, TX 75062
via ecf

US Trustee:

William Neary
Office of the US Trustee
1100 Commerce, Rm 9C60
Dallas, TX 75242
via ecf

All Parties Requesting Notice

via ecf or usps first class